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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

August 4, 1998

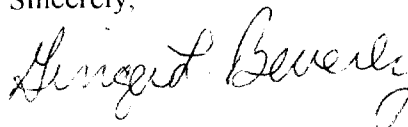
Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

Re: Comments of the Alliance for Public Technology in
the Matter of Application by BellSouth for Provision
of In-Region, Interlata Services in Louisiana

Dear Ms. Salas:

Please find enclosed an original and eleven copies of the
above-referenced submission and the document on disk. You may
reach me at (202) 408-1403 if you have any questions. Thank you for
your assistance.

Sincerely,



Ginger L. Beverly
Administrative Assistant

Enclosures

Q11

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the matter of the)
Application by BellSouth)
For Provision of)
In-Region, Interlata)
Services in Louisiana)

CC Docket No. 98-121

**COMMENTS OF THE ALLIANCE FOR PUBLIC TECHNOLOGY
CC DOCKET NUMBER: 98-121**

More than a decade into telecommunications restructuring, and thirty months under the Telecommunications Act of 1996, reality is emerging. The promised benefits of a ubiquitous, advanced telecommunications infrastructure provided for in Section 706 of the Act have yet to be realized for all sectors of our nation, particularly those in traditionally underserved communities.

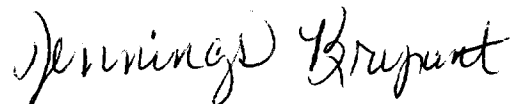
The Alliance for Public Technology (APT) is gravely concerned that these communities could fall farther behind with rapid technological changes outpacing existing policies and discouraging investment in networks that enable everyone to send and receive voice, data, video and graphic transmissions using any technology.

The Commission has the opportunity to reverse that trend by encouraging facilities-based investment that is buttressed by pro-active policies to bring the digital world within the reach of marginalized communities. As BellSouth's pending request to provide long distance service in Louisiana and other 271 applications are being considered, we strongly recommend that the Commission require the RBOCs to work closely with community-based organizations (CBOs) to develop advanced telecommunications technology applications that address community needs. We also recommend that they be required to report on the progress of their partnerships. This approach can help promote infrastructure deployment in underserved communities by facilitating aggregation of community-driven demand to make investments there more attractive financially.

APT's general position on in-region inter-LATA service, as previously stated, simply reflects the goals of the Congress and the Commission – namely, that the most expeditious implementation of the “letting in/letting out process” best serves the public interest. For the sake of all the public interest benefits that Congress sought from speedy implementation of the “letting in/letting out” process, APT hopes that the coming months will see substantial progress in this respect. Our hope is that the FCC, after consultation with the state Commissions and the Department of Justice, will end the gamesmanship on both sides and effect the needed breakthrough consistent with the Act's provisions and purposes.

With the increasing focus on building out high capacity bandwidth to the home, the regulatory process is becoming more and more out of step with the way the marketplace works. Data networks do not recognize LATA boundaries for the delivery of integrated services. The framework for implementing 271 is rapidly becoming an albatross on the operation of the market. We, therefore, urge the Commission to give the most serious consideration to BellSouth's 271 application and others that follow.

Respectfully submitted,



Jennings Bryant
Chair
APT Board of Directors



Donald Vial
Chair
APT Policy Committee

Alliance for Public Technology
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Washington, D.C. 20005

August 4, 1998